

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Mi-Jack Products, Inc.
Attn: Harvey E. Schmidt
3111 West 167th Street
Hazel Crest, Illinois 60429

Application No.: 95010109

I.D. No.: 031117AAE

Applicant's Designation: PAINTSPRAY

Date Received: February 17, 2006

Subject: Paint Spray Booths

Date Issued:

Expiration Date:

Location: 3111 West 167th Street, Hazel Crest

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of two paint spray booths controlled by dry filters pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) less than 25 tons per year, 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. The two paint spray booths are subject to limitations of 35 IAC 218.204(k)(1) for Heavy Off-Highway Vehicle Products Coating, Extreme performance prime coat, which provides that:

- i. The Permittee shall not apply at any time any coating in which the VOM content exceeds the following emission limitations. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>kg/l</u>	<u>lb/gal</u>
0.45	3.5

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.
- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart g: Use of Organic Material, shall apply only to photochemically reactive material.
- 3a. Emissions and operation of the spray booths shall not exceed the following limits:

<u>Material</u>	<u>Material Usage (Gallons/Month)</u>	<u>VOM Content (Lbs/Gallon)</u>	<u>Volatile Organic Material Emissions (Lbs/Month)</u>	<u>(Tons/Year)</u>
Paint (Including Solvents & Thinners)	700	3.50	2,450	14.70
Cleaning Solvents	50	7.40	370	2.22

These limits are based on the information provided in the permit application and maximum operating conditions. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. This permit is issued based on negligible emissions of particulate matter from each paint spray booth with dry filter. For this purpose, emissions from each emission unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 4a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit,

without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- b. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in this permit.
 - i. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the two paint spray booths and maintain the information at the source for a period of three years:
 - A. The name and identification number of each coating as applied on each affected coating line; and
 - B. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each affected coating line.
 - ii. The amount of paint and cleaning solvent used (tons/month, tons/year).
 - iii. The VOM and HAP contents of each material used (percent by weight).
 - iv. Monthly and annual VOM and HAP emissions, with supporting calculations. The emissions shall be calculated assuming 100

percent of the VOM and HAP used is emitted, (tons/month and tons/year).

5. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
6. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
7. Two (2) copies of required reports and shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

Please note that the gas-fired heating units are exempt from state air permit requirements, pursuant to 35 Ill. Adm. Code 201.146(d).

If you have any questions on this, please call Dwayne Booker at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DLB:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the paint booth operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario that results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 100 tons/year of VOM and combined HAPs, 10 tons/year of individual HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Material</u>	Emissions in Tons Per Year			
	<u>VOM</u>	<u>PM</u>	<u>Single HAP</u>	<u>Combined HAPs</u>
2 Spray Booths				
Paint (Including Solvents and Thinners)	14.70	0.88		
Cleaning Solvents	<u>2.22</u>			
Total	16.92	<u>0.88</u>	<u>< 10</u>	<u>< 25</u>

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